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Redwood City, CA 94063

Examiner Andre Boyce  
Commissioner of Patents and Trademarks  
Washington, D. C. 20231

Nov. 20<sup>th</sup>, 2006

Re: Patent Application for "A Declarative Method for Business Management"  
Application SN 09/476,711  
David O. McGoveran, Inventor

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**NOV 20 2006**

Dear Examiner Boyce:

The Final Office Action cited two grounds for rejection, "failing to comply with the enablement requirement" (p. 2 ¶5) and "non-statutory subject matter" (p. 3 ¶7, specifically, "no concrete result"). This Response addresses and traverses these grounds. I prepared it to assist a rapid review of the specific details that establish the traversal.

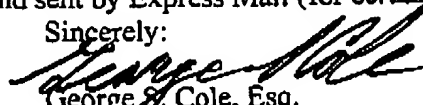
Firstly, the first independent Claim (Claim 112), is set out with embedded specific citations to the enabling text (and drawings) of the Specification. Then the enabling definitions expressly stated in the Specification are set out. Next explanatory and enabling examples in the Specification are set out. For those skilled in the field, given access to those references cited earlier by the Office, these provide sufficient enablement.

Secondly, the law concerning "statutory subject matter" is very summarily reviewed. Then the examples showing "concrete" and "tangible" results in the Specification are referenced, jointly and briefly. Then specific claim limitations and language in the Specification showing "concrete" and "tangible" results are cited, text that I feel may have been overlooked. Next, the argument in the Final Office Action that the claimed invention "is merely a "reasoning paradigm" " is expressly demonstrated to be an inaccurate summation; because the first independent claim begins describing the invention as, "A computer-implemented business method...." Then the minimality of the utility threshold in the law is identified. After that five specific, tangible, and useful results stated in the Specification are cited, and just one dependent claim(of many) that set forth additional specific useful results is highlighted. Finally, the independent evidence from the expert first identified and cited by the Office, plainly establishing "the invention's usefulness", as submitted by Declaration, is noted. For each, and all, of these reasons this traversal is established.

The length of this Response, required to identify and cite specific details that hasty or superficial review might not catch, is solely intended as respectful support.

Again, if you do not agree that the claims are prepared to issue, I request a telephone interview at your earliest convenience, within the next two weeks. This response is both being faxed (for your earliest attention) and sent by Express Mail (for certainty).

Sincerely:

  
George S. Cole, Esq.  
PTO #40,563